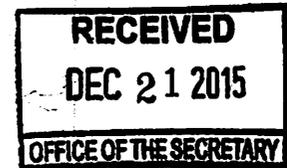


UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549

ADMINISTRATIVE PROCEEDING
File No. 3-16755



In the Matter of
SUCCESS TRADE, INC.,
SUCCESS TRADE SECURITIES, INC.,
AND
FUAD AHMED

SUCCESS TRADE, INC., SUCCESS TRADE SECURITIES, INC. AND FUAD AHMED'S

OPENING BRIEF

Success Trade, Inc., Success Trade Securities, Inc. and Fuad Ahmed hereby submit the following brief in support their request that the SEC issue no further sanctions. The sanctions already levied are sufficient, and the further prosecution by the SEC is unjustified and driven by prejudice.

To begin, the first line of the opening brief claims Ahmed ran a Ponzi scheme. Nowhere throughout the stipulated decision is there the use of the word Ponzi. The SEC is trying to prey upon the prejudice of this tribunal. Sadly, having a name like "Fuad Ahmed", being from Pakistan, and being a Muslim are strikes one, two and three. Add the slur of Ponzi to the mix and we might as well call the game before the first pitch is thrown. Ahmed asks this tribunal to be impartial, and not to be swayed by prejudice or unsupported slurs. Listen to his story, evaluate his credibility, and assess the sanctions already levied. In the end, you will find that the sanctions already imposed are more than sufficient.

Ahmed was the owner and CEO of Success Trade, Inc. ("STI"). STI was the parent company of an online broker dealer called Success Trade Securities, Inc. ("STS"). STS used a trading platform called BP Trade, Inc. ("BPT") to execute online trades. STI had a profitable year following the launch of a branch of STS called Just2Trade ("J2T"). STI made just over just over \$200,000 that year.

Ahmed was looking to build on the success of J2T to compete with the likes of E*Trade. To that end, Ahmed began raising money through STI. STI prepared a prospectus and promissory note to raise 5 million dollars, and made the proper SEC filing to do so. The interest from investors however was more than expected. The 5 million dollar raise became a 20 million dollar raise. Ahmed failed to make a further SEC filing when the additional money was raised. He admits failing to do so, and also that the prospectuses he used to raise money were not sufficiently amended to reflect the additional money he raised.

The prospectuses disclosed that Ahmed would use his discretion in using the money raised. The extra money raised was used to advertise and build STS and J2T, to pay off debt, and to fuel new goals of making STI a public company, of purchasing an Australian Broker Dealer, and of leasing or selling BPT's proprietary software. A portion was also used for payroll and expenses to attain these goals.

Ahmed made every effort to reach his goals. He twice flew to England to get STI listed on a European exchange, and twice flew to Australia to attend meetings, sign letters of intent, and conduct due diligence to purchase an Australian broker dealer. He regularly met with his BPT software developers and hired a consultant to build a client base for BPT. This momentum ceased following an unwarranted raid and prejudicial press releases by FINRA. Ahmed still managed to run his online broker dealer business for two more years and salvage what he could by selling the assets of STS for \$900,000.

Ahmed's goals were made clear to investors and were supported by them. Everyone who invested wanted STS to become the next E*Trade. They all knew the risks, and they also hoped for the reward. Notably, **NOT A SINGLE INVESTOR WILL TESTIFY AGAINST AHMED AT THIS HEARING. NOR HAS A SINGLE INVESTOR EVER TESTIFIED AGAINST AHMED IN EITHER THE FINRA OR SEC ACTION.** Quite to the contrary, Ahmad Khokhar, one of the largest investors in STI, testified favorably for Ahmed.

The SEC has already taken its pound of flesh, and frankly much more than that, as Ahmed has agreed to full restitution and a penalty. No further penalties should be issued.

For what it's worth, every major investment bank speculated in the grandest scale through the sale of mortgage backed securities, yet not one was barred from the industry . . . not Bank of America, not Goldman Sachs, not Merrill Lynch, not Lehman Brothers, not Bear Stearns, not JP Morgan. Nor were their CEO's barred. Certainly STI was a risky investment, and some might even say speculation, but offering the investment was not close to the conduct exhibited in the mortgage backed security scandal.

Ahmed thanks this tribunal for the opportunity to present the testimony of he and his witnesses.

DATED: December 11, 2015

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